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July 31, 2025

Magistrate Judge Gary Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: Francis M. Savoy v. The City of New York, et al.  
Case No. 1:24-cv-01978-DEH-GS  
GMP File No.: X293TP

Dear Magistrate Judge Stein:

I represent the Plaintiff, Francis M. Savoy, and submit this letter to request a brief extension of time to complete discovery.

We request an extension of fact discovery from July 31, 2025 to August 6, 2025.

Since our last request for extension (ECF No. 76), documents were produced on Wednesday, July 30, 2025. No witnesses have been produced for depositions. However, depositions of three Reicon Group, LLC employees are calendared for Monday August 4, 2025. Thus, we respectfully request additional time to complete discovery.

Extending the deadline for fact discovery will permit the parties to complete the production, review the documents, and complete the three depositions. All of this will take place ahead of the joint status report due to the Court on August 7,

2025, enabling the parties to complete fact discovery and update the Court accordingly.

Tangentially, having briefly reviewed of Reicon Group, LLC (“Reicon”)’s Response to Plaintiff’s Request For Production of Documents produced on Wednesday July 30, 2025, there may be a discovery dispute which may need to be addressed by the Court. Certain documents referenced in prior productions and the Fed. R. Civ. P. 30(b)(6) deposition of Reicon have not been produced. We will discuss this with counsel for Reicon on August 4, 2025, and attempt to resolve the issue.

If your Honor requires additional information, please contact me.

Very truly yours,

Nicholas P. Giuliano

**To (via ECF):**

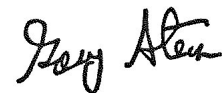
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Given the limited amount of time sought for an extension, the application is granted. In addition, the parties note that there may be a looming discovery dispute. The undersigned requires that the parties meaningfully meet and confer before raising any discovery disputes with the Court. Please review the undersigned’s individual practice rules for more. The status letter deadline of August 7, 2025 remains in place.

Date: August 4, 2025  
New York, NY

**SO ORDERED:**



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**HON. GARY STEIN**  
UNITED STATES MAGISTRATE JUDGE